

ATTACHMENT A
STATEMENT OF FACTS: GINETTE F. TCHAYA-TCHONTA

DEC 10 2012

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

The United States and the Defendant agree that if this case proceed to trial, the United States would prove the following facts below beyond a reasonable doubt. The parties agree that these are not all of the facts that would have been proved if this case proceeded to trial.

ACB *GT*
GINETTE F. TCHAYA-TCHONTA ("TCHAYA-TCHONTA") was born in Cameroon in 1979⁴ and entered the United States on a tourist visa on February 23, 1999. **TCHAYA-TCHONTA** applied for political asylum (Temporary Residence) in June 1999. On February 22, 2000, the Immigration and Naturalization Service denied **TCHAYA-TCHONTA**'s asylum request. **TCHAYA-TCHONTA**'s immigration case was completed after dismissal of her appeal on February 10, 2003 and her case was turned over to ICE's deportation branch for her removal.

ACB *GT* *ACB*
At some point before November 22, 2012, **TCHAYA-TCHONTA** obtained the social security number, birth certificate, and other identifying information of R.C.S., an actual U.S. citizen. **TCHAYA-TCHONTA** also obtained a fake District of Columbia identification card bearing R.C.S.'s name but containing the former's picture. On or about November 22, 2012, **TCHAYA-TCHONTA** executed a DS-11, Application for United States Passport, at the U.S. Post Office in Bethesda, Maryland. That DS-11 was filled out with R.C.S.'s personal information including her date of birth, parental information, place of birth, and social security number, but bore **TCHAYA-TCHONTA**'s photograph. Included with that application was R.C.S.'s birth certificate.

On December 2, 2011, State Department passport examiners requested additional information to substantiate the R.C.S. passport application. Subsequently, **TCHAYA-TCHONTA** contacted R.C.S. to obtain the additional background information requested by the State Department. This information included R.C.S.'s childrens' birth certificates, rental agreement, baptismal record, and school records. **TCHAYA-TCHONTA** also caused a falsified birth affidavit (DS-10) in the name of R.C.S.' mother to be executed, and submitted that along with the Supplemental Identification Worksheet to the State Department. The State Department accepted the information and issued a U.S. Passport in R.C.S.'s name on December 15, 2011.

On July 11, 2012, **TCHAYA-TCHONTA** fled the United States to Canada and crossed the international border at Niagara, New York, using the R.C.S. passport. She was accompanied by her common law husband, Christel Valery Tchoufac-Ndingue. Both **TCHAYA-TCHONTA** and Tchoufac-Ndingue knew that agents had visited her sister's home looking for her and that a friend, Robert Tchammouo, who had also made a falsified passport application using the identity of R.C.S.' son, had been arrested the previous day. On October 9, 2012, **TCHAYA-TCHONTA** voluntarily returned to the United States from France and surrendered herself to arrest.

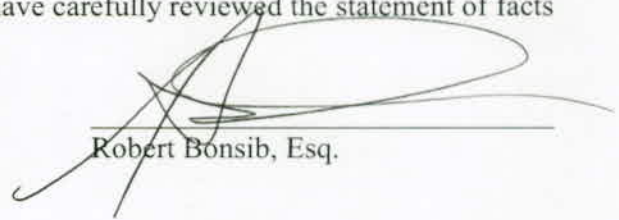
I have read this statement of facts, and have carefully reviewed it with my attorney. I acknowledge that it is true and correct.

12/3/12
Date


Ginette F. Tchaya-Tchonta

I am Ginette Tchaya-Tchonta's attorney. I have carefully reviewed the statement of facts with him.

12/3/12
Date


Robert Bonsib, Esq.